

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AGCS MARINE INSURANCE COMPANY,

Plaintiff,

v.

WORLD FUEL SERVICES, INC. and
WORLD FUEL SERVICES EUROPE, LTD.,

Defendants.

14-CV-5902 (PAE)(SN)

**NOTICE OF MOTION
FOR SUMMARY
JUDGMENT**

**ORAL ARGUMENT
REQUESTED**

PLEASE TAKE NOTICE that Defendants/Counterclaimants World Fuel Services, Inc. and World Fuel Services Europe, Ltd., upon the Declaration of Mari K. Bonthuis and the exhibits thereto; the Local Rule 56.1 Statement; the previously-filed Joint Stipulation of Facts (Dkt. 60-1) and the exhibits (Dkt. 63-1 through Dkt. 63-28) thereto; and the accompanying memorandum of law will and hereby do move this Court, before The Honorable Paul A. Engelmayer, United States District Judge, at the Thurgood Marshall United States Courthouse, Courtroom 1305, 40 Foley Square, New York, New York, as soon as counsel may be heard, for an Order: (1) granting summary judgment in favor of Defendants/Counterclaimants and against AGCS Marine Insurance Company (“AGCS”) on Defendants/Counterclaimants’ First Counterclaim for declaratory relief; (2) granting summary judgment in favor of Defendants/Counterclaimants and dismissing AGCS’s First and Second Causes of Action in its Complaint dated July 30, 2014; and

(3) granting such other and further relief as the Court may deem just and proper.

Dated: New York, New York
December 18, 2014

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